

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ARANSAS PRINCESS CONDOMINIUM
ASSOCIATION, INC.,

Plaintiff,

V.

LANDMARK AMERICAN INSURANCE
COMPANY

Defendant.

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CIVIL ACTION NO. 2:18-CV-341

JOINT MEDIATION REPORT AND
AGREED REQUEST FOR EXTENSION OF DEADLINES

TO THE HONORABLE COURT:

Pursuant to the Court's Scheduling Order dated December 17, 2018 (Dkt. No. 10), Plaintiff Aransas Princess Condominium Association, Inc. and Defendant Landmark American Insurance Company provide this report on the parties' progress toward mediation.

This is a first party commercial property insurance case concerning condominium buildings in Port Aransas, Texas. The Plaintiff is claiming over \$12 million in damage to the property. To date the parties have exchanged nearly 20,000 documents. The parties anticipate producing more documents. Both sides have provided initial expert reports, with a total of thirteen (13) different retained experts being designated thus far, in addition to non-retained experts. In light of the voluminous written and discovery to date, the parties are discussing a workable deposition schedule for the fact witnesses and experts.

The Final Pretrial Conference is currently scheduled for January 9, 2020. As the parties work through the voluminous written discovery, expert discovery, and depositions, they anticipate that they will be ready for mediation by mid-September 2019, and they have scheduled

a mediation in Corpus Christi with Greg Thompson of Thompson Law Office & Mediation Center for **September 12, 2019**.

In light of the progress through discovery to date and the anticipated voluminous written discovery, expert discovery, and amount of depositions still to occur, the parties respectfully request that the Court alter the following pre-trial deadlines:

- Discovery must be complete by: **9/30/2019**, with the same caveat as contained in the current Scheduling Order that the parties may agree to conduct discovery beyond the deadline; and
- Dispositive Motions will be filed by: **10/18/2019**.

At this time, the parties have not requested a continuance of the Final Pretrial Conference or trial date. Rather, they simply anticipate additional time to conduct discovery and to file dispositive motions.

Respectfully submitted,

WINSTEAD PC

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